

OFA TAIMANI
2053 E. Bayshore Rd. # 25
Redwood City, CA 94063

Ofa Taimani
t4im4ni@gmail.com

September 2, 2025

VIA HAND DELIVERY

Sequoia Union High School District
District Office
Attn: Board Secretary or Clerk
480 James Ave.
Redwood City, CA 94062

Re: Government Tort Claim – Ofa Taimani

Dear Sequoia Union High School District:

Enclosed please find a Government Tort Claim being presented by Complainant Ofa Taimani. My office was unable to locate a specific Tort Claim Form required to be used by Sequoia Union High School District. Furthermore, the use of a specific form is not indicated or required by Sequoia Union High School District's Board Policy Manual – Regulation 3320: Claims And Actions Against the District. As such, the enclosed Tort Claim identifies all of the contents required by Board Regulation 3320.

Should any further information be needed or required by Sequoia Union High School District, please reach out to my office immediately. Thank you for your prompt attention in this regard.

Very truly yours,

OFA TAIMANI



Ofa Taimani

cc: CROSS BRIDGE INVESTIGATION Danilo Molieri P.I. # 22949

OFA TAIMANI
2053 E. Bayshore Rd. SPC 25
Redwood City, CA 94063
P: (650) 228-8787

1 **GOVERNMENT TORT CLAIM AGAINST SEQUOIA UNION HIGH SCHOOL DISTRICT**

2 **NAME AND CONTACT INFORMATION OF COMPLAINANT**

3 Ofa Adriana Taimani, 2053 East Bayshore Road Space 25, Redwood City, CA 94063; % Dan
4 Molieri (CrossBridge Investigations) 2768 Hillview Dr, Fairfield Ca, 94534. Phone: (925)-984-1278,
5 DTMOLIERI@gmail.com

6 **DESCRIPTION OF THE EVENTS LEADING TO THE CHARGES**

7 Ofa Taimani ("Taimani") was hired by Menlo-Atherton High School & Sequoia Union High
8 School District (the "District") on or about January 2015. Taimani's current position is School Secretary
9 and her supervisor is Instructional Vice Principal Emily Rigotti (Rigotti). Taimani is 36 years old, Pacific
10 Islander and her national origin is Tongan. Taimani is a permanent, tenured employee of the District. In
11 addition to her secretarial duties, she has served as an assistant Menlo-Atherton High School basketball
12 coach under Head Coach Mike Molieri.

13 In July of 2022, Assistant Principal Stephen Emmi directed Taimani to inform Head basketball
14 coach Mike Molieri of a parent's complaint alleging that Assistant Coach Jhavante Hill, an African
15 American male, had verbally abused their son. Taimani asserts this accusation was false.

16 Soon thereafter, on or about August of 2022, Assistant Principal Emmi informed Taimani that the
17 same family had now accused Head Coach Molieri of verbal abuse. Assistant Superintendent Todd Beal
18 ("Beal") initiated an investigation, which was assigned to investigator Clair Cunningham. Despite her role
19 as assistant coach who attended all practices and games with Molieri, Taimani was not interviewed.

20 In Fall of 2023, it became public that a Menlo-Atherton administrator had released a student's
21 special education file to the Atherton Police Department without parental consent.

22 Soon thereafter, in November 2023, Beal requested a meeting with Taimani; Taimani was unaware
23 of any complaint filed against her. When Taimani sought clarification about the purpose of the meeting,
24 Beal threatened termination if she did not attend.

25 Union President Renee Alvarez ("Alvarez") denied Taimani's request to reschedule the meeting,
26 effectively depriving her of union representation, after Taimani learned she was being accused of a felony
27 (unauthorized release of student records). Taimani notified Private Investigator Dan Molieri for guidance
28 and legal advice. Beal accused Taimani of the following:

- 1 • Allowing Dan Molieri into the Principal Office
- 2 • Asked for and provided Ivan Medina and Keanu Shay Caldwell confidential special educational
3 student information to an individual without parent or school consent

4 It should be noted that throughout this time frame, Taimani has a close friendship with Mike
5 Molieri, who actively has legal actions against the District. Due to the above, the District continues to
6 retaliate and target Taimani for no purpose other than to cause her stress and anguish. In fact, shortly
7 thereafter, Investigator made a public appearance and advised the School Board which meeting was
8 attended by Beal that it was Ivan Medina Mom who contacted him. Taimani never knew the above two
9 students let alone has any involvement in the special education department or “STARS” program

10 Because of the action of the District, Taimani was on medical leave due to a stress related work
11 injury that the Qualified Medical Evaluator Dr. Hosein Tahami has confirmed in writing. In December
12 2023, she filed a complaint of retaliation and harassment against Beal and Alvarez.

13 In April 2024, upon returning to work, Taimani discovered her job duties had been significantly
14 altered without training. Soon thereafter, in May of 2024, Rigotti completed an employee evaluation
15 accusing Taimani of two incidents during the 2023–2024 school year. Taimani contends these accusations
16 were false and unsupported by evidence, and Rigotti refused to amend the evaluation.

17 In May 2024, Beal issued findings concluding that Taimani mishandled student files. His
18 conclusion relied solely on Rigotti’s verbal accusation without documentary evidence. Meanwhile,
19 Taimani’s December 2023 complaint was assigned to Human Resources Director Freedom Siyam
20 (“Siyam”), who reports directly to Beal. Taimani raised concerns of bias in writing to Superintendent
21 Crystal Leach (“Leach”), who took no action.

22 In June 2024, Siyam’s biased findings did not include the fact that Beal had violated regulation
23 1312.1 and that no written complaint was ever received or written out, nor any documentary evidence was
24 ever gathered.

25 In August 2024, after summer break, the District continued to retaliate and discriminate against
26 Taimani, increasing her duties without training. Rigotti assigned her responsibility for handling special
27 education files—the very duties she had previously accused Taimani of mishandling. Despite repeated
28 requests, neither Rigotti nor the District provided training.

1 These actions were done to constructively terminate Taimani for filing a uniform complaint of
2 discrimination, retaliation. Throughout this time frame, Taimani among other individuals in the District
3 have consistently complained and reported discriminatory practices within the District. It should be noted
4 in fact that Caucasians administrators and instructors had committed FERBA violations which also
5 included access to children's files without parental consent or court order issue. It is clear these allegations
6 relied upon the district and constructively terminating Taimani's employment on actions that are protected
7 by the Whistle Blower Protection act California Labor Code 1102.5 and are discriminatory based that are
8 not of the same ethnic descent.

9 Since November 2023, Taimani has consistently requested a copy of the written complaint filed
10 against her. In August 2024, Superintendent and Board of Trustee's Secretary Laura Lauese confirmed in
11 writing that no such document exists.

12 In September 2024, Taimani took medical leave for another work-related injury and subsequently
13 filed a complaint of retaliation and harassment against Rigotti, Principal Karl Losekoot, Superintendent
14 Leach, and Beal. The District failed to address her complaint. In November of 2024, Taimani filed an
15 Equal Employment Opportunity Commission ("EEOC") complaint.

16 In March 2025, the District terminated Taimani's employment. Taimani has received the Notice of
17 Right to Sue letter from the EEOC.

18 **NATURE OF INJURY AND DAMAGES/ LEGAL LIABILITY AND CAUSE OF INJURIES**

19 Taimani was discriminated against because of her national origin, race, sex and in retaliation for
20 engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended. The
21 district has engaged and Violated Labor Code section 98.6 which prohibits wrongful termination,
22 Discrimination and retaliation against an employee.

23 The circumstances presented herein appear to be indicative of a pattern and practice of improper
24 activity within the District. It is believed that there are other situations wherein District personnel have,
25 and continue to, purposefully violate its own policies as it relates to nondiscrimination, reasonable
26 accommodation, fair investigation of employee complaints, uniform complaint procedures, and board
27 approval for engagement of consultants to employee matters.

28 Although Taimani reported her concerns regarding her good faith and reasonable belief that

improper, unethical and illegal actions were occurring at the direction of District employees, directly to the District, none of these persons took action to correct these violations. Taimani was instead retaliated against when she was unlawfully terminated from her employment with the District and was stripped of her medical benefits while on a medical work related injury.

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AMOUNT CLAIMED

A. Economic Damages

At the time of being terminated by the District, Taimani had been employed by the District for approximately 14 years. She had planned to remain with the District for a significant amount of time. Total amount of loss income is currently unknown, but ongoing and is anticipated to be in excess of 35,000.

B. Non-Economic Damages

Taimani has been diagnosed with anxiety, depression, panic disorder, emotional distress, and damage to reputation. Taimani has suffered stress and other related issues due to the stress of being terminated and the financial difficulties that she is now facing. The anxiety and other related issues due to this have necessitated Taimani to seek treatment. Due to the ongoing investigation, she is unable to locate comparable employment.

Taimani's interactions with his friends, former colleagues and society generally have also been harmed by the emotional distress she suffered as a result of the discrimination, harassment, and retaliation. Taimani feels embarrassed when she is around others that are aware of the allegations against her. Taimani's anxiety and depression is unlikely to improve while this claim against the District is unresolved.

Total amount of loss non-economic damages is currently unknown, but ongoing and is anticipated to be in excess of 35,000.

CONCLUSION

Taimani engaged in protected activity when she reported her reasonable belief that legal violations were occurring in the District. However, she was retaliated against when her employment was unlawfully terminated by the District.

Due to Taimani's well-founded concerns regarding the District's violations of its own policies as it

1 relates to nondiscrimination, reasonable accommodation, fair investigation of employee complaints,
2 uniform complaint procedures, and board approval for engagement of consultants to employee matters
3 she expressed her belief, both verbally and in writing, that a violation of law was occurring. The District
4 was aware that their actions violated their own policies and applicable law.

5 Due to this, the retaliatory activity has caused and continues to cause Taimani significant harm

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7 Dated: September 2, 2025

Respectfully submitted,

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10 Ofa Taimani
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